

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	)	
	)	Bankruptcy No. 18-24699 GLT
Gregory Scott Isenberg	)	
	)	
Debtor (s)	)	
	)	Chapter 13
Gregory Scott Isenberg	)	
	)	
Movant(s)	)	
v.	)	Document No.
	)	
Wells Fargo Bank, N.A.	)	
	)	
Respondent(s)	)	

MOTION TO EXTEND TIME TO COMPLY WITH LBR 3002-4

To the Honorable Judge:

The Debtor(s), by their attorney, hereby move to extend the time required to file a Response to the Notice of Mortgage Payment Change filed by the Respondent on January 20, 2022. In support of this motion debtor(s) aver:

1. The Respondents filed a Notice of Mortgage Payment Change on January 20, 2022. In compliance with LBR 3002-4, the Debtor must file an amended chapter 13 plan, a declaration regarding the NMPC, or an objection to the NMPC within twenty-one (21) days after the NMPC is filed, and is therefore due by February 10, 2022.

2. Counsel for debtor requests additional time to comply with LBR 3002-4 to provide the debtor an opportunity to cure the plan deficiency (two months of plan payments totaling \$1,600).

3. The Debtor requests that the time to comply with LBR 3002-4 be extended by 45 days. There are sufficient funds on hand to continue to make full payments on the mortgage obligation.

**WHEREFORE**, the Debtors pray that they be permitted to extend the time to comply with LBR 3002-4 be extended to March 26, 2022.

Date: February 9, 2022

/s/ Scott R. Lowden  
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